

Montana Guidance Regarding the Use of Title I A Funds for Homeless Students as amended by the Consolidated Appropriations Act, 2014

On March 20, 2014, the U.S. Department of Education (USED) issued a “Dear Colleague” letter to all state Title I and Homeless Coordinators regarding the use of Title I, Part A funds to support McKinney-Vento programs serving homeless children and youth. The Consolidated Appropriations Act of 2014 provides further clarification of the use of Title I funds for the support of homeless liaisons and for providing transportation to the school of origin. The Montana Office of Public Instruction (OPI) encourages authorized representatives, clerks, Title I staff, and homeless liaisons to read the [letter](#) from Dr. Monique Chism, Director of Student Achievement and School Accountability Programs (SASA).

The following guidance applies to Title I, Part A funds beginning in the 2014-2015 school year, and all carryover funds from the 2013-2014 or 2012-2013 school years that will be spent out during the 2014-2015 school year.

ESEA Requirements for All LEAs

The OPI’s Title I, Part A Program and the Title X, Homeless Education Program urge all local education agencies (LEAs) to conduct a needs assessment to determine if homeless students may be enrolled in local schools that are not served by Title I, Part A funds.

All homeless students are categorically eligible for Title I services and must be provided with “comparable” services if they are enrolled in a school which does not receive Title I, Part A funds. Although all homeless students are eligible, an LEA may determine that individual students are not in need of Title I, Part A services based on the overall criteria for determining which students are “most in need” and “most likely” to be at risk of failure.

All LEAs that receive Title I, Part A funds **MUST** set aside a portion of those funds for comparable services to homeless students if they have one or more schools that are not served by or are not eligible for Title I services. Although there is no minimum amount required for this set aside, LEAs are urged to consider the actual cost of providing services to these students and the number of students who must be served when determining the amount of Title I, Part A funds that will be set aside for this use.

The set aside for “Homeless Children” should be made within the ESEA/NCLB Consolidated Application under the “Select Eligible Attendance Areas” tab under “Targeting Step 4.” Funds placed in this box are to be used to cover costs directly related to education, such as:

- Full-time equivalents (FTEs) for a Title I teacher or paraprofessional to provide direct services;
- additional Title I materials to be located at non-Title I schools;
- technology necessary to provide Title I services at non-Title I schools;
- school supplies or materials necessary for homeless children to participate in regular classes at a non-Title I school (*“regular classes” includes all core classes and electives, including AP/Honors, CTE, IB, Athletics, Fine Arts, Digital Academy, or other courses offered to all other students*); or

- other related expenses.

*These funds may also be used to provide FTEs for a homeless liaison if that staff member's duties **also include other Title I duties.***

Please explain how this set aside will be used in the comments box at the bottom of the Targeting Step 4 page.

Set Asides	
Private School Non-Instructional Costs	0 <input type="text"/>
Administration	0 <input type="text"/>
Homeless Children	0 <input type="text"/>
Neglected/Delinquent Children	0 <input type="text"/>
Preschool (District Wide)	0 <input type="text"/>

Additional Uses of Funds Allowable Under the Consolidated Appropriations Act, 2014

The new appropriations language allows LEAs to use **additional** Title I, Part A funds for the following purposes in regard to the provision of services to homeless students:

1. **FTE for a part-time or full-time homeless liaison who does not have additional Title I duties:**
LEAs may use funds to enable current staff members to dedicate a specific amount of FTE to the duties of the homeless liaison based on the needs of the community. FTE may include a full-time position dedicated specifically to serving homeless students based on a needs assessment.
2. **"Incremental costs" to transport a homeless student to the school of origin:** Title I, Part A funds should not be used to cover the full cost of transporting students. The OPI understands the term "incremental costs" to mean any additional burden to the district above the cost of transporting a regularly-housed student. Furthermore, this expense is to be approved by the LEA's authorized representative and must be budgeted for within an approved ESEA/NCLB Consolidated Application prior to the funds being spent.

Funds set aside for the purpose of providing FTEs for a homeless liaison or for the incremental costs of transportation are to be in addition to and not in lieu of funds which have been set aside to provide comparable services to children enrolled in non-Title I schools.

LEAs who elect to set aside additional funds to pay for FTEs for a homeless liaison or to cover the "incremental costs" of transportation **MUST** place those funds in the box for the "Administration" set aside within the ESEA/NCLB Consolidated Application under the "Select Eligible Attendance Areas" tab under "Targeting Step 4."

Please explain how this set aside will be used in the comments box at the bottom of the Targeting Step 4 page.

Set Asides	
Private School Non-Instructional Costs	0
Administration	0
Homeless Children	0
Neglected/Delinquent Children	0
Preschool (District Wide)	0

FTEs for a homeless liaison paid with Title I, Part A funds must be accounted for in either the Title I, Part A Basic or the Title I, Part A Schoolwide Application. LEAs should leave set aside funds to be used by the homeless program in the Title I, Part A Basic Budget as these funds may provide services to students in schools that do not operate a schoolwide program. LEAs who move all funds into the Title I, Part A Schoolwide Budget may continue to do so with set aside funds that will be used for the homeless program. However, it is important to remember that the homeless program must also provide services to students enrolled in non-Title I schools within the district.

Note that the McKinney-Vento Act only applies to students enrolled in public schools. Homeless funds and services cannot be provided to students enrolled in private schools. LEAs may choose to offer referral services or technical assistance to private schools but are not required to do so.

On the “Budget Pages” tab, please select either the “Targeted Assistance Full-Time Equivalents” or the “Schoolwide Full-Time Equivalents” tab. Tab selection will depend on the type(s) of programs currently operating within the LEA. Homeless liaisons are generally intended to serve all students within a district, although each LEA is encouraged to implement staffing based on individual needs. FTEs for a homeless liaison paid in whole or in part by Title I, Part A funds should be recorded under “Staff providing support services (non-clerical).”

JOB CLASSIFICATION	FULL-TIME EQUIVALENTS (FTEs)
Administrators (nonclerical)	
Teachers	
Instructional Paraprofessionals	
Staff providing support services (non-clerical)	
Staff providing support services (clerical)	
Other	
Total	

Homeless liaisons who are also providing direct tutoring services, or who are contracted as a “Teacher” or “Instructional Paraprofessional” should have their FTEs recorded in the correct boxes.

JOB CLASSIFICATION	FULL-TIME EQUIVALENTS (FTEs)
Administrators (nonclerical)	<input type="text"/>
Teachers	<input type="text"/>
Instructional Paraprofessionals	<input type="text"/>
Staff providing support services (non-clerical)	<input type="text"/>
Staff providing support services (clerical)	<input type="text"/>
Other <input type="text"/>	<input type="text"/>
Total	<input type="text"/>

On the “Budget Detail” tab of the “Budget Pages” tab in either the basic or the schoolwide application the actual funds to be spent should be recorded. **All expenditures related to a homeless program must be listed under “Topic 1: Improving Academic Achievement.”** Salaries and benefits for the homeless liaison should be placed under the Purpose Category “20-Support Services.”

Topic 1: Improving Academic Achievement					
Purpose Category	100 Personal Service- Salaries	200 Employee Benefits	300 Purchased Professional and Technical	400 Purchased Property Services	500 Other Purchased Services
27-Pupil Transportation	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
20-Support Services	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Funds to be spent on the incremental costs of transportation should be placed under the Purpose Category “27-Pupil Transportation.”

Topic 1: Improving Academic Achievement					
Purpose Category	100 Personal Service- Salaries	200 Employee Benefits	300 Purchased Professional and Technical	400 Purchased Property Services	500 Other Purchased Services
27-Pupil Transportation	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
20-Support Services	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

LEAs may amend their ESEA/NCLB Consolidated Application at any time during the school year if there is a dramatic increase in the number of homeless students in need of transportation services, or if the LEA determines that there is an increased need for FTEs for a homeless liaison. LEAs are encouraged to reevaluate needs in the event of a natural disaster, such as wildfires or flooding, which destroys multiple homes in the community.

Questions or concerns regarding the Consolidated Appropriations Act, 2014 or the OPI’s guidance for the use of Title I, Part A funds should be directed to Heather Denny, State Coordinator for Homeless Education, at 406-444-2036 or to Jack O’Connor, Assistant Title I Director, at 406-444-3083.